Can Manufacturers' Coalition Exclusion Request #1

(a) The designation of the product under a recognized standard or certification (e.g., ASTM, DIN) or the commercial name for the product and the HTS number under which the product enters the United States:

ANSWER: Single reduced tin coated steel used for two-piece D&I food cans
HTS No. 7210.12

[**********] This product is part of a broader category of single and double reduced electrolytically chromium or tin-coated steel in widths equal or over 38 inches regardless of gauges, temper, finish, coating or other properties.

[******** ********** **********]** This product is also part of a broader category of single reduced tinplate in widths ranging from 750 millimeters to 1230 millimeters in the following thicknesses:

0.251 mm (90 pound base box)
0.260 mm
0.267 mm (95 pound base box)
0.275 mm (97 pound base box)
0.279 mm (100 pound base box)

[**********] It is covered by HTS. Nos. 7210.12.0000 and 7210.50.0000.

(b) A description of the product based on physical characteristics (e.g. chemical composition, metallurgical properties, dimensions, surface quality) so as to distinguish the product from products for which exclusion is not sought:

ANSWER: The product that Ball Corporation requires is single reduced tin coated steel used to produce two-piece drawn and ironed food cans. The current specification is: 97#/base box, .15/.15 tin coating, 33 11/16 in. wide, Type L, T3.5 CA, low chrome.

[**********] Because the material for the broader category of this product is designed for end-use D&I, there is a need for extra clean (free of nonmetallic inclusions) tin mill products. Therefore, the steel must be specially selected and the products are produced on lines with nonmetallic inclusion detectors (IDD devices), **[**********]**

[**********] The broader category of this product possesses type MR or higher chemical compositions and is continuously annealed with a yield strength between 295 mpa and 380 mpa and a tensile strength between 370 mpa and 455 mpa. These products have a minimum elongation of 20 percent and R-bar from 1.0 mini and Delta-R+/-0.30 with a shot blast finish roughness between 0.80 and 1.20 micrometers.

(c) The basis for requesting an exclusion:

ANSWER: Ball Corporation uses this material to produce two-piece "Drawn and Ironed" or "D&I" cans. **[**********]** First, in 1996 Ball decided to convert a production line in the **[**********]** plant, which had been producing aluminum beverage cans, to a steel food can production line. Ball sought to install a production line for two-piece cans that would use a production method and a high grade of steel that would yield extremely good quality products primarily for fruits and vegetables, and would be highly efficient. Ball approached a number of steel producers, principally domestic producers, but also **[**********]**, seeking to establish an arrangement for the supply of steel. U.S. mills were invited to qualify as a supplier, but **[**********]** was the only one to actually qualify their steel for production quantities at start up.

Ball has repeatedly sought to qualify another supplier – a domestic U.S. supplier – for the **[*******]** facility, but without success. Although U.S. suppliers produce D&I steel, **[**********]** have each failed to qualify their products for use in Ball's state of the art plant. **[******]** did qualify its product in 1999 and supplied product to the plant for a brief time, but serious problems with the quality of the **[**********]** product led Ball to rescind the qualification. Ball has tried to re-qualify **[********]** product, but these attempts have been unsuccessful. **[**********]** has not been able to meet Ball's requirements because they are not capable of meeting Ball's no passivation treatment requirements. Unsuccessful attempts to qualify products from **[**********]** and **[**********]** took place in **[**********]**. Despite repeated attempts, Ball has not been able to qualify or maintain qualified status with any domestic supplier for the D&I steel used in its **[**********]**. Provided as Attachment 1 is documentation of **[**********]**

(d) The names and locations of any producers, in the United States and foreign countries, of the product:

ANSWER: No domestic producer has been able to qualify or maintain qualified status for the D&I steel that Ball's state of the art **[*******]** plant requires **[**********]**

(e) Total U.S. consumption of the product, if any, by quantity and value for each year from 1996 to 2000, and projected annual consumption for each year from 2001 to 2005, with an explanation of the basis for the projection:

ANSWER: The following data reflect Ball Corporation's purchased quantity and the associated value for 1996 through interim 2001, and projected annual consumption. Ball does not have data for total U.S. consumption of the product.

Year	Quantity (short tons)	Value (landed, duty-paid in $ U.S.)
1996	**[********	**********]**

1997	**[********	**********]**
1998	**[********	**********]**
1999	**[********	**********]**
2000	**[********	**********]**
Jan – June 2000	**[********	**********]**
Jan – June 2001	**[********	**********]**

[**********]

(f) Total U.S. production of the product for each year from 1996 to 2000, if any:

ANSWER: As described above, no U.S. produced material meets Ball Corporation's technical qualifications. **[**********]**

(g) The identity of any U.S.-produced substitute for the product, total U.S. production of the substitute for each year from 1996 to 2000, and the names of any U.S. producers of the substitute:

ANSWER: No U.S.-produced substitutes are available for this product.

Attachment 1

Not Susceptible to Public Summarization

Can Manufacturers' Coalition Exclusion Request #2

(h) The designation of the product under a recognized standard or certification (e.g., ASTM, DIN) or the commercial name for the product and the HTS number under which the product enters the United States:

ANSWER: EOLE Endstock, [************************]HTS No. 7210.12.0000

(i) A description of the product based on physical characteristics (e.g. chemical composition, metallurgical properties, dimensions, surface quality) so as to distinguish the product from products for which exclusion is not sought:

ANSWER: DR 550 (double reduced temper), Base Weight 77, Tin free steel, CA (continuous anneal), L (steel type), 7C (finish), DOS (lubricant), .215 mm x 900.1 mm, High Elongation – minimum 3%

[***] This product is part of a broader category of steel coated with tin and/or chromium with a thickness below 0.50 mm, yield strengths between 420 mpa and 750 mpa, and minimum elongation between 4 percent and 22 percent.

(j) The basis for requesting an exclusion:

ANSWER: Crown Cork & Seal Company ("Crown") currently purchases small amounts of this product from [****** **] produce the end stock for "Easy Opening, Low Energy" (EOLE) cans that Crown's customers are introducing to the United States market. (These are the pull top end-units with a tab that are currently being used in such products as vegetable, meat, soups, and pet food cans.) The end units of these cans require steel with a combination of extra-clean quality and certain unique physical properties that [********] mills currently produce, but U.S. mills do not. [********] mills have non-metallic inclusion (i.e. defect) detectors in place on their lines, while U.S. mills do not. Consistent with Crown's historic "buy American" policy, in December 2000, Crown began working with domestic producers [******** ****** ********* ****** *** **** ******] to assist them in their efforts to create a steel product that meets Crown's requirements for the EOLE end. Crown is hopeful that these domestic companies will succeed, but has no guarantees. Presently, and in the foreseeable future, this material is not available domestically.

(k) The names and locations of any producers, in the United States and foreign countries, of the product:

ANSWER: [******* ********* ***** *] There is no U.S. production.

(l) Total U.S. consumption of the product, if any, by quantity and value for each year from 1996 to 2000, and projected annual consumption for each year from 2001 to 2005, with an explanation of the basis for the projection:

ANSWER: Crown Cork & Seal does not have information on total, annual consumption of the product nationwide, but can provide data pertaining to its own operations. The following data reflect Crown Cork and Seal's purchased quantity and the associated value for 1996 through interim 2001, and projected annual consumption:

Year	Quantity (short tons)	Value (landed, duty-paid in $ U.S.)
1996	**[***	*******]
1997	**[***	*******]
1998	**[***	*******]
1999	**[***	*******]
2000	**[***	*******]
Jan – June 2000	**[***	*******]
Jan – June 2001	**[***	*******]
2001	**[****	**********]
2002	**[****	**********]
2003	**[****	**********]
2004	**[****	**********]
2005	**[****	**********]

[*** ********** *** ***** ** ***** ********** ********** ****** *** ********** **** ****** *** ******** *** ********** *******]**

(m) Total U.S. production of the product for each year from 1996 to 2000, if any:

ANSWER: None.

(n) The identity of any U.S.-produced substitute for the product, total U.S. production of the substitute for each year from 1996 to 2000, and the names of any U.S. producers of the substitute:

ANSWER: There is no U.S. produced substitute for the EOLE Endstock. EOLE is a new product that has particular metallurgical and chemical properties. EOLE provides the safety and convenience that regular ends do not provide.

Can Manufacturers' Coalition Exclusion Request #3

(a) The designation of the product under a recognized standard or certification (e.g., ASTM, DIN) or the commercial name for the product and the HTS number under which the product enters the United States:

ANSWER: Tab stock for EOLE ends. **[*************************************** *********]** This product is electrogalvanized and lacquered strips for tabstock. **[******** ****************************]** It is covered by HTS Nos. 7210.12.0000 and 7210.50.0000

(b) A description of the product based on physical characteristics (e.g. chemical composition, metallurgical properties, dimensions, surface quality) so as to distinguish the product from products for which exclusion is not sought:

ANSWER: EZ (electrolytic zinc coated), T-65 (temper) + ZE 15/15
Upper Side 5 Microns Gold 8015: Back Side 5 Microns Silver 8016, L (steel type), CA (continuous anneal), 7C (finish),
Electro Galvanized
Hardness: HR 30 T 69/75
Size: 72.6 mm x .300 mm

(c) The basis for requesting an exclusion:

ANSWER: **[******* **** * **** ******* ********* ********* ********* ***** ****** ** **** ******* **** ***** ** ******* ******* *** ***** ******** *** ******* ****** **** **** ******* ********* *** *********** ** *** ****** ****** ************** *** *** ******* ********* **** ***** **** ********* ***** **** ****** ******** ** ********** ***** ***** *** *** **** ****** ****** ** **************** **** ******** ********** ** ******* **** ******** ** **** **** ******** *** ***** ** ** ********* **** ******* ***** ** ********* ************ **** **** ******** **********]**

(d) The names and locations of any producers, in the United States and foreign countries, of the product:

ANSWER: **[********** ******** ****]** There is no U.S. production of this product.

(e) Total U.S. consumption of the product, if any, by quantity and value for each year from 1996 to 2000, and projected annual consumption for each year from 2001 to 2005, with an explanation of the basis for the projection:

ANSWER: The following data reflect Crown Cork and Seal's purchased quantity and the associated value for 1996 through interim 2001, and projected annual consumption:

Year	Quantity (short tons)	Value (landed, duty-paid in $ U.S.)
1996	**[***	*******]
1997	**[***	*******]

1998	**[***	*******]
1999	**[****	*******]
2000	**[***	*******]
Jan – June 2000	**[***	*******]
Jan – June 2001	**[****	*******]
2001	**[****	********]
2002	**[****	********]
2003	**[****	********]
2004	**[****	********]
2005	**[****	********]

[*** ********** *** ***** ** ********** ***** ********** *******]**

(f) Total U.S. production of the product for each year from 1996 to 2000, if any:

ANSWER: None.

(g) The identity of any U.S.-produced substitute for the product, total U.S. production of the substitute for each year from 1996 to 2000, and the names of any U.S. producers of the substitute:

ANSWER: There is no U.S. produced substitute for the EOLE Tab stock.

Can Manufacturers' Coalition Exclusion Request #4

(a) The designation of the product under a recognized standard or certification (e.g., ASTM, DIN) or the commercial name for the product and the HTS number under which the product enters the United States:

ANSWER: Drawn & Ironed ("D&I") 300 x 407 (or other sizes) Two Piece Can stock, HTS No. 7210.12.0000

**[**********] This is part of a broader category of single and double reduced electrolytically chromium or tin-coated steel in widths equal or greater than 38 inches regardless of gauges, temper, finish, coating or other properties.

(b) A description of the product based on physical characteristics (e.g. chemical composition, metallurgical properties, dimensions, surface quality) so as to distinguish the product from products for which exclusion is not sought:

ANSWER: T4 (temper), Base Weight with a range of 100-135, 20/30 Tinplate (tincoating level), Widths greater than 37 inches wide, L (steel type), CA (continuous anneal), 5B (finish), ATBC (lubricant)

[**********] material is designed for end-use D&I there is a need for extra clean (free of nonmetallic inclusions) tin mill products. Therefore, the steel must be specially selected and the products are produced on lines with nonmetallic inclusion detectors (IDD devices), **[********

(c) The basis for requesting an exclusion:

ANSWER: **[**********]

(d) The names and locations of any producers, in the United States and foreign countries, of the product:

ANSWER: **[**********]

(e) Total U.S. consumption of the product, if any, by quantity and value for each year from 1996 to 2000, and projected annual consumption for each year from 2001 to 2005, with an explanation of the basis for the projection:

ANSWER: The following data reflect Crown Cork and Seal's purchased quantity and the associated value for 1996 through interim 2001, and projected annual consumption:

Year	Quantity (short tons)	Value (landed, duty-paid in $ U.S.)
1996	**[***	****]
1997	**[***	****]
1998	**[***	****]
1999	**[***	****]
2000	**[***	****]
Jan – June 2000	**[***	****]
Jan – June 2001	**[***	****]
2001	**[***	*******]
2002	**[******	**********]
2003	**[******	**********]
2004	**[******	**********]
2005	**[******	**********]

[****** *** ****** ** ****** ********** ********** **** ******** ******* ********** ******* *** **** ****** **** ***** ********* ********** ******** **** *** ***** ***** ******]**

(f) Total U.S. production of the product for each year from 1996 to 2000, if any:

ANSWER: None.

(g) The identity of any U.S.-produced substitute for the product, total U.S. production of the substitute for each year from 1996 to 2000, and the names of any U.S. producers of the substitute:

ANSWER: There is no U.S.-produced substitute for the wide D&I product. **[**********
****** *** **** ********* *** *** ***** ** * **** ********** *********]**

Can Manufacturers' Coalition Exclusion Request #5

(a) The designation of the product under a recognized standard or certification (e.g., ASTM, DIN) or the commercial name for the product and the HTS number under which the product enters the United States:

ANSWER: Draw/Redraw 301 x 408 (or other sizes) stock for Salmon Cans

(b) A description of the product based on physical characteristics (e.g. chemical composition, metallurgical properties, dimensions, surface quality) so as to distinguish the product from products for which exclusion is not sought:

ANSWER: T3 (temper), Base Weight 80, tin free steel, 35 8/16th inches wide, L (steel type), CA (continuous anneal), 7C (finish), DOS (lubricant)

(c) The basis for requesting an exclusion:

ANSWER: **[****** ***** ** ********* ********* ******* ** ********* **** ********
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(d) The names and locations of any producers, in the United States and foreign countries, of the product:

ANSWER: **[**** ******* ********** *** ********* ******* *** **********
********** ********** ********** ********** ****** ***** ******** ***
******** *** ******* ******** **** ***** ********* ******** ********* **********
*** **** ** ******* ** *** *******]**

(e) Total U.S. consumption of the product, if any, by quantity and value for each year from 1996 to 2000, and projected annual consumption for each year from 2001 to 2005, with an explanation of the basis for the projection:

ANSWER: The following data reflect Crown Cork and Seal's purchased quantity and the associated value for 1996 through interim 2001, and projected annual consumption:

Year	Quantity (short tons)	Value (landed, duty-paid in $ U.S.)
1996	**[******	**********]**
1997	**[********	**********]**
1998	**[********	**********]**

1999	**[*******	**********]**
2000	**[********	**********]**
Jan – June 2000	**[*************	**********]**
Jan – June 2001	**[*************	**********]**

2001	**[******	**********]**
2002	**[******	**********]**
2003	**[******	**********]**
2004	**[******	**********]**
2005	**[******	**********]**

[*********** *********** ************* ************* ************* *********** ************* *********** *********** *********** ************* *********]**

(f) Total U.S. production of the product for each year from 1996 to 2000, if any:

ANSWER: [*********** *********** *********** *********** *********** ************* *********]**

(g) The identity of any U.S.-produced substitute for the product, total U.S. production of the substitute for each year from 1996 to 2000, and the names of any U.S. producers of the substitute:

ANSWER: There is no substitute for the draw/redraw salmon cans.

Draw/redraw salmon cans are one of the most specification sensitive products that Crown Cork & Seal manufactures.

Can Manufacturers' Coalition Exclusion Request #6

(a) The designation of the product under a recognized standard or certification (e.g., ASTM, DIN) or the commercial name for the product and the HTS number under which the product enters the United States:

ANSWER: Draw Redraw 301 x 408 (or other sizes) & Draw Redraw 307 x 200 (or other sizes) Laminated Steel Salmon Cans; ASTM A 657/623. **[**********]** HTS. No. 7326.9085.86.

(b) A description of the product based on physical characteristics (e.g. chemical composition, metallurgical properties, dimensions, surface quality) so as to distinguish the product from products for which exclusion is not sought:

ANSWER: T3 (temper), Base Weight 80, tin free steel
PC023 DRCAN Protact External Coat: Pet 20G, St/Internal Coat; Pet 20C, ST, RP, MR (steel type), CA (continuous anneal), Light Stone Finish

(c) The basis for requesting an exclusion:

ANSWER: U.S. suppliers have been unable to provide laminated steel. Crown requires this product for use in making salmon cans. A domestic tin mill producer indicated it was interested in providing laminated product but has not made capital improvements necessary to provide it. Therefore, Crown has sourced the produced from **[******].**

(d) The names and locations of any producers, in the United States and foreign countries, of the product:

ANSWER: To Crown's knowledge Corus (Netherlands), Rasselstein (Germany), NKK (Japan), and Nippon (Japan) produce this product.

(e) Total U.S. consumption of the product, if any, by quantity and value for each year from 1996 to 2000, and projected annual consumption for each year from 2001 to 2005, with an explanation of the basis for the projection:

ANSWER: The following data reflect Crown Cork and Seal's purchased quantity and the associated value for 1996 through interim 2001, and projected annual consumption:

Year	Quantity (short tons)	Value (landed, duty-paid in $ U.S.)
1996	**[*****	****]
1997	**[*****	****]
1998	**[*****	****]
1999	**[*****	****]
2000	**[*****	****]
Jan – June 2000	**[*****	****]

Jan – June 2001	**[*******	******]
2001	**[****	********]
2002	**[****	**********]
2003	**[****	**********]
2004	**[****	**********]
2005	**[******	**********]

[***************** ** ***** ************ ********** **************** ************** ********* *** ******************]

(f) Total U.S. production of the product for each year from 1996 to 2000, if any:

ANSWER: None for 1996-2000.

(g) The identity of any U.S.-produced substitute for the product, total U.S. production of the substitute for each year from 1996 to 2000, and the names of any U.S. producers of the substitute:

ANSWER: There are no substitute products produced domestically. **[****** *********** **** **** **************** ** ****** ***** ***** ******** ********** ***** *** ****** **** ******* ****** ******** * ********* ******* *** *** ************ *** ******* ********* **** ******* ********************* *** ********* ** ******* ************* ******** ************ *********** ** *** ****** *** ******** ********* ************* *********** ***** ********** *** ***** ** ************** ** ******* ** **** **** *** ********* ******* *************** ***********].

Furthermore, the draw/redraw laminated material salmon cans and the regular draw redraw salmon cans are two of the most specification sensitive products that Crown Cork & Seal manufactures. Claims based on faulty product are prohibitive because the filled salmon can is so high priced.

Can Manufacturers' Coalition Exclusion Request #7

(a) The designation of the product under a recognized standard or certification (e.g., ASTM, DIN) or the commercial name for the product and the HTS number under which the product enters the United States:

ANSWER: Ferrolite; when ordered the item is called: Aerosol BTM end plate-LAM. **[***** **********]** It is covered by HTS. No. 7326.9085.86.

(b) A description of the product based on physical characteristics (e.g. chemical composition, metallurgical properties, dimensions, surface quality) so as to distinguish the product from products for which exclusion is not sought:

ANSWER: For all of the following specifications, U.S. Can Company has ordered either laminated – 15 microns PET colorless I/S & O/S, or laminated – 15 microns PET colorless I/S and 25 microns PET white O/S.:

[**********] ECCS (tin coating), CA (temper), 5C (surface finish), T5 (temper), MR, ordered width of 33.6875";

[**********] ECCS, CA, 5C, T5, MR (ordered width of 31.3125");

[**********] ECCS, CA, 5C, T5, MR (ordered width of 31.3125"); or

[**********] ECCS, CA, 5C, T5, MR (ordered widths of 35.3125" and 35.4375")

(c) The basis for requesting an exclusion:

ANSWER: [**********] because it is unavailable in the United States. The laminated steel U.S. Can requires has never been available commercially in the United States. U.S. Can has talked with domestic steel suppliers for close to ten years about manufacturing laminated steel. **[**********.]** U.S. Can has been working on and off with **[*******]** at least **[******]**. U.S. Can provided to **[*******]** information detailing the market and technical requirements for this product. U.S. Can told **[*******]** on several occasions that if they meet U.S. Can's technical criteria, U.S. Can is committed to sourcing from them. In fact, U.S. Can would prefer to source this product domestically. In February 2000, the company asked **[*******]** about the status of the project and restated their interest. However, the reality is that **[*******]** is currently not close to having this product commercially available.

[*******] currently has a **[**********]** and U.S. Can has received for evaluation a limited number of test products, **[**********]** Despite their public statements that they would **[**********.]** Even if **[**********]** tomorrow, it

would take at least two years before they would be producing commercial quantities of laminated steel product for U.S. Can's plant. **[*******]** would still have to assemble the equipment, install it, test it, debug it, among other processes, and this is a long procedure. In addition, **[*******]** would have to qualify the product with U.S. Can and U.S. Can would have to qualify the product with its customer. U.S. Can does not know of any domestic steel mill that produces laminated steel to U.S. Can's product specifications. Provided as Attachment 2 is documentation of **[**********]**

(d) The names and locations of any producers, in the United States and foreign countries, of the product:

ANSWER: [**********]

Over the years, U.S. Can has tested **[**********]**, but the products from those mills have not met U.S. Can's technical requirements. There are no U.S. producers of this laminated steel product.

(e) Total U.S. consumption of the product, if any, by quantity and value for each year from 1996 to 2000, and projected annual consumption for each year from 2001 to 2005, with an explanation of the basis for the projection:

ANSWER: The following data reflect U.S. Can's purchased quantity and the associated value for 1996 through interim 2001 and projected annual consumption:

Year	Quantity (short tons)	Value (landed, duty-paid in $ U.S.)
1996	**[****	**********]
1997	**[****	**********]
1998	**[****	**********]
1999	**[****	**********]
2000	**[***	**********]
Jan – June 2000	**[***	**********]
Jan – June 2001	**[***	**********]
2001	**[****	**********]
2002	**[****	**********]
2003	**[****	**********]
2004	**[****	**********]
2005	**[****	**********]

[**********]

(f) Total U.S. production of the product for each year from 1996 to 2000, if any:

ANSWER: None that meets U.S. Can's technical specifications.

(g) The identity of any U.S.-produced substitute for the product, total U.S. production of the substitute for each year from 1996 to 2000, and the names of any U.S. producers of the substitute:

ANSWER: There is no U.S.-produced substitute for the product that meets U.S. Can's technical specifications. The laminated material required by U.S. Can is currently used for the bottoms of aerosol cans. U.S. Can's technical specifications require use of PET laminate for those products. U.S. Can did not qualify polypropylene, another laminate, because it is a softer material and is more difficult to handle. The polypropylene also has a tendency to scratch and hair.

Over the years, U.S. Can also has attempted to work with several **[**********]** to apply the **[**********]** steel supplied by domestic steel producers. For example, the company worked with **[**********]** U.S. Can had discussions with at least one other **[**********]** for them to be interested. Some **[**********]**. However, the **[**********]** applied in this process does not meet the specifications for use on **[**********.]**

Attachment 1

Not Susceptible to Public Summarization